

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California's Energy Utilities

Rulemaking 07-01-042  
(January 25, 2007)

Southern California Edison Company's (U 338-E) Application for Approval of SCE's "Change A Light, Change The World," Compact Fluorescent Lamp Program.

Application 07-05-010  
(May 10, 2007)

**COMMENTS OF DISABILITY RIGHTS ADVOCATES ON THE PROPOSED  
DECISION REGARDING THE LIEE PROGRAM**

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## I. INTRODUCTION

On November 19, 2007, Commissioner Grueneich and Administrative Law Judge Malcolm issued the “Proposed Decision Providing Direction for Low Income Energy Efficiency Policy Objectives, Program Goals, Strategic Planning and the 2009-2011 Program Portfolio and Addressing Renter Access and Assembly Bill 2140 Implementation” (“PD”). Disability Rights Advocates (DisabRA) submit the following comments in response to this PD.

DisabRA became involved in this proceeding to represent the specific and unique needs of persons with disabilities. Persons with disabilities are disproportionately low income and accordingly rely on programs such as LIEE. Indeed the Final Report on Phase 2 Low Income Needs Assessment (KEMA Report) found that one in four low income households have a member with a disability, and that for 20% of all low income households, the responsibility for making energy payments on behalf of the household lies with a disabled household member.<sup>1</sup> Persons with disabilities are also highly dependent on energy and thus, on programs providing affordable access to energy. The KEMA Report found that 56% of low income households with a disabled member spend more than 5% of their total household income on energy.<sup>2</sup> This dependence on energy stems from several facts including the fact that many persons with disabilities spend more time at home than their non-disabled counterparts,<sup>3</sup> that electricity powers much of the assistive technology which allows persons with disabilities to live independently in the

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<sup>1</sup> “Final Report on Phase 2 Low Income Needs Assessment,” issued by the California Public Utilities Commission, September 7, 2007, p. 4-7 and 4-22.

<sup>2</sup> KEMA Report, p. 5-15. DisabRA recognizes that the Medical Baseline program is designed to address additional energy needs resulting from a person’s disability. The Medical Baseline program is open to all with disabilities, not just low income customers. Even though Medical Baseline may reduce costs resulting from a greater energy burden, persons with disabilities who are low income, like all low income customers, continue to face substantial burdens in paying their energy bills.

<sup>3</sup> National Organization on Disability-Harris Poll in 2000 found that people with disabilities are less likely to socialize and participate in leisure activities outside the home.

community and that some disabilities cause an individual to be particularly sensitive to extreme temperatures.

Given the needs of the disabled population, DisabRA appreciates the PD's continued support of the "quality of life" goals of the LIEE program. However, DisabRA respectfully requests that the final decision incorporate DisabRA's comments on the KEMA Report within the discussions of auto-enrollment, partnerships with other entities and targeted outreach so that the needs of persons with disabilities will be addressed in the final decision.

## **II. DISABILITY RIGHTS ADVOCATES APPRECIATES THE PROPOSED DECISION'S CONTINUED SUPPORT OF QUALITY OF LIFE GOALS OF THE LIEE PROGRAM.**

While the PD decision "sets a new course for the LIEE programs in California,"<sup>4</sup> it explicitly notes that, in addition to the LIEE programs being an energy resource, such programs are intended to among other things "improve [low income customers'] quality of life."<sup>5</sup> As DisabRA pointed out in its comments on the objectives and goals of the LIEE program, "[n]on-energy benefits, such as health, safety and comfort, are of particular concern for persons with disabilities."<sup>6</sup> While 26% of low income households reported a health problem due to a condition of their home, such as poor air quality or house temperature, 42% of low income households with a disabled household member report such a health-related concern.<sup>7</sup> This is unsurprising given that some physical disabilities affect a person's respiratory function or ability to regulate body temperature. In addition, the KEMA report found that 86% of low income households have at least one comfort concern, such as the house being too cold or too hot. These comfort concerns are common for temperature-sensitive persons with disabilities.

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<sup>4</sup> PD, p. 3.

<sup>5</sup> *Id.*

<sup>6</sup> Disability Rights Advocates' Comments on LIEE Program Objectives and Goals (April 27, 2007), p. 4.

<sup>7</sup> KEMA Report, p. 5-29

The PD also adopts the following policy: “LIEE programs should include measures that may not be cost-effective but that may promote the quality of life of participating customers.”<sup>8</sup> DisabRA supports this policy. As DisabRA explained in its comments on the objectives and goals of the LIEE program, LIEE measures may not be cost-effective as their installation may not result in a decrease in energy consumption for some low income customers. This is because some low income households currently may eliminate some forms of energy usage altogether because of their inability to pay costly energy bills. Accordingly, increased energy efficiency through the installation of energy efficient measures may allow these low income customers to restore such usage and actually increase energy use.<sup>9</sup> DisabRA believes that the PD, in noting that improving quality of life may not always be cost-effective, appropriately accounts for this possibility.

### **III. DISABILITY RIGHTS ADVOCATES RESPECTFULLY REQUESTS THAT THE FINAL DECISION INCORPORATE ITS COMMENTS ADDRESSING THE KEMA REPORT.**

In discussing implementation strategies for the LIEE program, the PD discusses the parties’ comments on the KEMA report. As the PD notes, parties were asked to comment on the KEMA Report’s recommendations and provide specific implementation ideas. DisabRA submitted comments to this effect and respectfully request that the relevant portions of those comments be incorporated into the final decision.

#### **A. DisabRA Supports Investigating Auto-Enrollment in the LIEE Program If a Household Receives Disability Benefits.**

The PD notes that SCE is in favor of investigating auto-enrollment in the LIEE Program if a household receives social security or disability benefits.<sup>10</sup> DisabRA also provided comments on this issue.

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<sup>8</sup> PD, p. 3; *see also* Finding of Fact No. 10, p. 84.

<sup>9</sup> Disability Rights Advocates’ Comments on LIEE Program Objectives and Goals, p. 6.

<sup>10</sup> PD, p. 41.

In its comments on the KEMA report, DisabRA advocated “that the Commission investigate whether persons on SSDI who are the party responsible for paying the bill should automatically qualify for LIEE measures.”<sup>11</sup> DisabRA also noted that SSDI qualification is not based on household income. However, if the person on SSDI is the party responsible for paying the bill, as is the case in 20% of all low income households, it is likely that the SSDI payment is the primary, if not sole, income for the household, putting the household in the income range to qualify for LIEE.<sup>12</sup> DisabRA respectfully requests that its comments on the KEMA report be included as a part of the discussion on auto-enrollment.<sup>13</sup>

**B. DisabRA Supports Using CBOs as a Part of Efforts to Increase Participation in the LIEE Program.**

The PD notes that various parties in this proceeding are in favor of using CBOs as partners in efforts to increase participation in the LIEE program.<sup>14</sup> DisabRA urged the same approach in its comments on the KEMA Report.

In those comments, DisabRA explained that the KEMA Report found that households with persons who have disabilities are one of the “most promising” segments of the low income population for the LIEE program, meaning they exhibit need, willingness and can be easily accessed through existing outreach, including community-based strategies.<sup>15</sup> As such, DisabRA recommended that there be an aggressive outreach campaign to disability-related community-based organizations. DisabRA explained that

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<sup>11</sup> Comments of Disability Rights Advocates on the Issues Raised in the KEMA Report (October 16, 2007), p. 4.

<sup>12</sup> *Id.*

<sup>13</sup> DisabRA does not ask for a separate finding of fact, conclusion of law or ordering paragraph on this issue as the issue is addressed only in the body of the decision.

<sup>14</sup> PD, p. 41-42.

<sup>15</sup> KEMA Report, p. 7-13.

disability-related community-based organizations that specialize in providing information on assistance programs and advocacy for persons with disabilities, such as independent living centers, have a high percentage of clients who are low income and that these organizations function as a clearinghouse for information on enrollment in other public programs, such as SSDI, and could add energy savings programs to the information which they provide. DisabRA respectfully requests that its comments on the KEMA report be included as a part of the discussion on partnerships with other entities.<sup>16</sup>

C. **DisabRA Urges that All Outreach Efforts Be Accessible to Persons with Disabilities.**

In its comments on the KEMA Report, DisabRA expressed concern that outreach for the LIEE program be accessible to persons with disabilities, particularly since the disabled population remains one of the most underserved populations by the LIEE program. DisabRA highlighted the key aspects of accessible outreach, much of which has been adopted by the Commission in other proceedings.<sup>17</sup> First, accessible outreach requires that the utilities maintain effective TTY service to ensure TTY calls are answered in the same manner and with the same efficiency as other voice calls.<sup>18</sup> Further, TTY numbers should be presented with the same prominence as other contact numbers.<sup>19</sup> Second, accessible outreach also requires that written outreach materials for

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<sup>16</sup> Again DisabRA does not ask for a separate finding of fact, conclusion of law or ordering paragraph on this issue as the issue is addressed only in the body of the decision.

<sup>17</sup> See generally D. 07-11-045 (November 16, 2007), App. A, p. 6 – 8. D.07-11-045 makes clear that qualification for the LIEE program is a threshold for participation in the low income incentive program within the California Solar Initiative (CSI). *Id.* at 15. As such, if the LIEE program is not accessible to persons with disabilities, the CSI program, despite the Commission’s endorsement of accessible communications, will effectively also be inaccessible to persons with disabilities. In order to be both consistent with other Commission decisions and to ensure that persons with disabilities can take advantage of the LIEE program, DisabRA has encouraged and continues to encourage the Commission to require that the LIEE program be made accessible to persons with disabilities.

<sup>18</sup> As adopted in D.06-12-038 (Dec. 14, 2006), p. 15.

<sup>19</sup> *Id.*

the LIEE program be made available in large print.<sup>20</sup> Additionally, the utilities should be directed to note in large print on the standard version of the outreach material that there is further information about the LIEE program available in large print upon request.

The PD does not discuss accessible outreach. DisabRA urges the Commission to ensure that its final decision addresses this important issue for persons with disabilities. DisabRA asks that the final decision incorporate its comments on accessible outreach. Further, DisabRA requests that the Commission include a finding of fact regarding accessible outreach per the proposed language in Appendix A

**D. DisabRA Advocates the Use of CBOs and Accessible Formats in All Marketing, Education and Outreach for the LIEE Program.**

The PD emphasizes the importance of marketing, education and outreach (ME&O). Again, DisabRA stresses the need to utilize disability-related CBOs in all efforts to target the disabled population. Further, as described above, DisabRA urges the Commission to require the utilities to ensure all ME&O is accessible to persons with disabilities. To this end, DisabRA urges the inclusion of the finding of fact regarding accessible outreach as noted in Appendix A.

**IV. CONCLUSION**

DisabRA appreciates the opportunity to describe the needs of its constituency with regards to the LIEE program. DisabRA believes that the PD appropriately continues to support the quality of life LIEE goals. DisabRA requests, however, that its comments on the KEMA Report be incorporated into the final decision. These comments recommend further investigation into auto-enrollment in the LIEE program if a household receives disability benefits, use of disability-related CBOs in efforts to expand participation in LIEE and provision of accessible outreach for the LIEE program. DisabRA respectfully requests that the Commission adopt DisabRA's recommendations as a part of the Commission's final decision.

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<sup>20</sup> Large print is the most common accessible format for written materials; however, the utilities should be prepared to make available other alternate formats, such as Braille, for any written materials relating to the

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Respectfully Submitted,

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LIEE program.



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